

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re: JEFFREY SCOTT THOMPSON,
Debtor,

Case No. 15-12621-JDL
Chapter 13

**OBJECTION TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND ABANDONMENT OF PROPERTY**

COMES NOW the Debtor, Jeffrey Scott Thompson, and hereby objects to the Motion for Relief from Automatic Stay and Abandonment of Property of Wells Fargo Bank, N.A., as Trustee for the RMAC REMIC Trust, Series 2009-4 (“Movant”) [Docket No. 69], and in support thereof, states as follows:

1. Debtor admits that he owes Movant for a promissory note and mortgage secured by a first mortgage lien on Movant’s home.
2. Debtors admits that there is an arrearage on said debt, but also states that he has made substantial payments to Movant during the term of his Chapter 13 case.
3. Debtor hereby offers to make adequate protection payments to Movant in the amount of \$2,000.00 per month.
4. The real estate involved herein is the home of Debtor, his wife and three (3) children and Debtor believes it has a value of approximately \$275,000. Debtor has significant equity in said property, and said property is a benefit to the estate in that it provides a home for Debtor and his family and in part allows Debtor a stable environment from which to be well employed.

5. Debtor invites discussions with Movant and its representatives regarding loan modification, particularly involving a reduction of interest rate, as a means of both resolving any current arrearages and making a more affordable home mortgage going forward.

WHEREFORE, Debtor, Jeffrey Scott Thompson, prays that the Trustee's Motion for Relief from Automatic Stay and Abandonment of Property be denied; and that the Debtor have all other and further just and equitable relief.

Dated this 12th day of May, 2017.

/s/ D. Neal Martin

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Attorney for Debtor, Jeffrey Scott Thompson

CERTIFICATE OF SERVICE

I, D. Neal Martin, hereby certify that on this 12th day of May, 2017, I relied upon ECF to forward copies of the above and foregoing Objection to Matthew J. Hudspeth of Baer Timberlake P.C., attorney for Movant, John T. Hardeman, Chapter 13 Trustee and the U.S. Trustee.

/s/ D. Neal Martin

D. Neal Martin